

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO: ~~01-6019~~-CR-DIMITROULEAS

00-6361
UNITED STATES OF AMERICA,

Plaintiff,

Vs.

AQUILINO DIMITRI ALONSO,
Defendants.

DEFENDANT'S UNOPPOSED MOTION TO FILE OBJECTIONS TO THE PSI

OUT OF TIME


COMES NOW, the Defendant, AQUILINO DIMITRI ALONSO, by and through his undersigned counsel, and respectfully requests that this court allow him to submit the Objections to the PSI filed simultaneously herewith, and in support would state:

1. The undersigned has spoken with AUSA Donald Chase, who indicated he had no objections to this Motion.
2. The undersigned has been unable to meet with his client (who speaks Spanish and resides in Miami) at an earlier period in time so as to review the PSI and make objections.
3. The sole issue framed by the objections is one which has been dealt with in prior sentencings with the co-defendants, and thus there is no surprise to the Probation Office or the U.S. Attorney's Office.
4. The objections are joined in by the U.S. Attorney's Office since the PSI is in violation of the terms of the Plea Agreement.

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WHEREFORE, the Defendant requests that this Motion be granted, and the Court to except the Objection as if it had been timely filed.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent this ____ day of ~~July~~, 2001 to the AUSA Don F. Chase by facsimile at 356-7336 and by U.S. Mail at U.S. Attorney's office at 299 E. Broward Blvd., Ft. Lauderdale, FL 33301 and to Kenneth Gonzalez, U.S. Probation by facsimile at (305) 523-5496.



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